

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SIDI MOUHAMED DEIDE, ADAMA SY,
ABDALLAHI SALEM, MOUHAMED SAID
MALOUM DIN, and JHONNY NEIRA on
behalf of himself and all similarly situated
people,

Plaintiffs,

v.

EDWIN J. DAY as Rockland County Executive;
STEVEN M. NEUHAUS as Orange County
Executive,

Defendants.

Case No. 23-cv-3954 (NSR)

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that the plaintiffs will move this Court on a date to be determined by the Court for class-wide preliminary injunctive and declaratory relief. As described more fully in their supporting memorandum and declarations, the plaintiffs seek an order enjoining, during the pendency of this action, (1) Defendant Edwin J. Day from all actions taken pursuant to the Rockland County Emergency Order No. 1, dated May 6, 2023; and further enjoining (2) Defendant Steven M. Neuhaus from all actions taken pursuant to the Orange County Executive Order of May 8, 2023.

In support of their motion, the plaintiffs file their Memorandum of Law in Support of Motion for Preliminary Injunction (dated May 15, 2023), the Declaration of Amy Belsher (dated May 15, 2023) with Exhibits 1-19, and the Declaration of Lourdes Chavez (dated May 15, 2023).

Dated: May 15, 2023
New York, New York

Respectfully Submitted,

NEW YORK CIVIL LIBERTIES UNION
FOUNDATION

/s/ Amy Belsher
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Counsel for Plaintiffs

* Application for admission in the Southern District of New York forthcoming